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9 AT&T PENSION BENEFIT PLAN - NONBARGAINED PROGRAM and AT&T, INC.

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17 Attorney for Plaintiff

18 WILLIAM GRAHAM

19 *Additional Counsel Listed on the Next Page*

20 UNITED STATES DISTRICT COURT
21 NORTHERN DISTRICT OF CALIFORNIA
22 SAN FRANCISCO DIVISION

23 WILLIAM GRAHAM,

24 Plaintiff,

vs.

25 AT&T PENSION BENEFIT PLAN -
26 NONBARGAINED PROGRAM; AT&T,
27 INC.; and DOES 1-10,

28 Defendants.

CASE NO. 11-CV-4085 TEH

**STIPULATION FOR DISMISSAL OF
ENTIRE ACTION WITH PREJUDICE
AND [PROPOSED] ORDER**

Complaint Filed: August 15, 2011

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11 Attorneys for Defendants
12 AT&T PENSION BENEFIT PLAN - NONBARGAINED PROGRAM and AT&T, INC.
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1 Plaintiff William Graham (“Plaintiff”), Defendant AT&T Pension Benefit Plan – Nonbargained
2 Program (“Plan”) and Defendant AT&T, Inc. (“AT&T”) hereby stipulate, by and through their
3 counsel of record, as follows:

- 4 1. Plaintiff has identified both the Plan and AT&T as defendants in this lawsuit filed under the
5 Employee Retirement Income Security Action of 1974, as amended (“ERISA”). Plaintiff has
6 served Defendants AT&T and the Plan with the Complaint, and Defendants AT&T and the
7 Plan filed Answers disputing Plaintiff’s entitlement to benefits under the Plan.
8 2. The parties have reached a settlement and have agreed Plaintiff will dismiss his entire action
9 voluntarily, with prejudice, pursuant to Federal Rule of Civil Procedure 41(a)(1).
10 3. The parties respectfully request, in the Proposed Order filed herewith, that the Court enter an
11 Order dismissing with prejudice Plaintiff’s entire action in the above-captioned matter.
12 4. Each party shall bear its own costs, attorneys’ fees and expenses.

13 IT IS SO STIPULATED by and between the parties.

14 Dated: April 23, 2012

PATRICK W. SHEA
STEPHEN H. HARRIS
M’ALYSSA C. MECENAS
PAUL HASTINGS LLP

15 By: _____ /s/ Patrick W. Shea
16 PATRICK W. SHEA

17 Attorneys for Defendants
18 AT&T PENSION BENEFIT PLAN – NONBARGAINED
19 PROGRAM and AT&T, INC.

20 Dated: May 1, 2012

ROGER P. ROZEK

21 By: _____ /s/ Roger P. Rozek
22 ROGER P. ROZEK

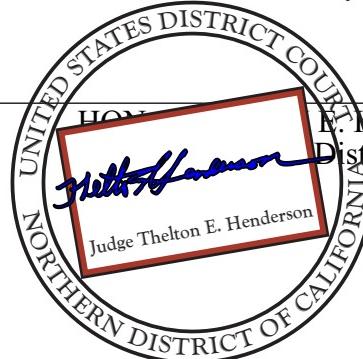
23 Attorney for Plaintiff
24 WILLIAM GRAHAM

1 **[PROPOSED] ORDER**
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3 PURSUANT TO STIPULATION, IT IS ORDERED that Plaintiff's entire action
4 be dismissed with prejudice. Each party shall bear its own costs, attorneys' fees and expenses.
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6 DATED: 05/23, 2012

7 By:



E. HENDERSON
District Court

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